

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal Case No. CR 22-222(2) (NEB/TNL)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	DEFENDANT'S MOTION TO MODIFY
)	CONDITIONS OF RELEASE
)	
AHMED YASIN ALI,)	
)	
Defendant.)	

Ahmed Yasin Ali, through undersigned counsel, hereby moves the Court for an Order modifying his conditions of release to permit him to temporarily travel outside the State of Minnesota and the United States to Somalia and India between the dates of November 26, 2023 and February 2, 2024 due to urgent family needs. Specifically, Mr. Ali has an older brother who has been diagnosed with cancer and is in need of medical treatment. (See accompanying doctor's letter filed under seal). Mr. Ali will travel to Somalia where his brother is located. He will then accompany his brother to India and take care of his brother while he undergoes chemotherapy and surgery. After the treatment which is expected to last about one month, Mr. Ali and his brother will return to Somalia. Mr. Ali will then return to Minnesota.

Mr. Ali further requests that the probation officer provide him with his passport to enable him to travel. Mr. Ali will return his passport to the probation officer within 48 hours of his return.

Mr. Ali has been fully compliant with the conditions of his pretrial release since he first appeared in Court more than 13 months ago. He has lived in the United States since 1996 and in Minnesota since 2012. Mr. Ali's life is here and he has no reason to flee. He also has not prior criminal record. Mr. Ali also notes that his two co-defendants have previously been given permission to travel abroad.

Undersigned counsel contacted the prosecution to inquire if it objected to this motion, but has not yet received a response. The defense has proceeded to file this motion because Mr. Ali is seeking to leave in twelve days and therefore needs to confirm as soon as possible that travel is authorized so that he can finalize the purchase of his tickets.

Dated: November 14, 2023

LAW OFFICE OF JORDAN S. KUSHNER

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